



AMERICAN
ARBITRATION
ASSOCIATION®

INTERNATIONAL CENTRE
FOR DISPUTE RESOLUTION®

Neil Currie
Vice President
2355 Highway 36 W.
Suite 400
Roseville, MN 55113
Telephone: (612)332-6545
Fax: (612)342-2334

February 24, 2023

Daniel M. Hattis, Esq.
Hattis & Lukacs
400 108th Avenue NE
Suite 500
Bellevue, WA 98004
Via Email to: dan@hattislaw.com

Ann Marie Mortimer, Esq.
Hunton Andrews Kurth LLP
550 South Hope Street
Suite 2000
Los Angeles, CA 90071
Via Email to: amortimer@hunton.com

01-22-0003-9225

Individuals

-vs-

Cellco Partnership d/b/a Verizon Wireless &
Verizon

Dear Parties:

This will acknowledge Process Arbitrator Meyerson's Order in which he made an administrative determination impacting this specific multiple case filing. In his Order, Arbitrator Meyerson ruled that a provision within these parties' arbitration agreement does not comply with the Consumer Due Process Protocol. A copy of the order is attached. Specifically, he concluded that section 6 of the parties' arbitration provision below violates Principle 8: Reasonable Time Limits.

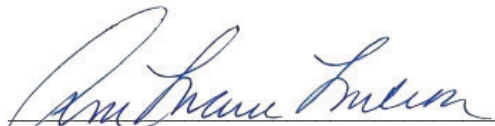
(6) IF 25 OR MORE CUSTOMERS INITIATE NOTICES OF DISPUTE WITH VERIZON WIRELESS RAISING SIMILAR CLAIMS, AND COUNSEL FOR THE VERIZON WIRELESS CUSTOMERS BRINGING THE CLAIMS ARE THE SAME OR COORDINATED FOR THESE CUSTOMERS, THE CLAIMS SHALL PROCEED IN ARBITRATION IN A COORDINATED PROCEEDING. COUNSEL FOR THE VERIZON WIRELESS CUSTOMERS AND COUNSEL FOR VERIZON WIRELESS SHALL EACH SELECT FIVE CASES TO PROCEED FIRST IN ARBITRATION IN A BELLWETHER PROCEEDING. THE REMAINING CASES SHALL NOT BE FILED IN ARBITRATION UNTIL THE FIRST TEN HAVE BEEN RESOLVED. IF THE PARTIES ARE UNABLE TO RESOLVE THE REMAINING CASES AFTER THE CONCLUSION OF THE BELLWETHER PROCEEDING, EACH SIDE MAY SELECT

ANOTHER FIVE CASES TO PROCEED TO ARBITRATION FOR A SECOND BELLWETHER PROCEEDING. THIS PROCESS MAY CONTINUE UNTIL THE PARTIES ARE ABLE TO RESOLVE ALL OF THE CLAIMS, EITHER THROUGH SETTLEMENT OR ARBITRATION.

...

As previously advised on June 29, 2022, the American Arbitration Association's (AAA) Consumer Arbitration Rules (Consumer Rules) in conjunction with the Supplementary Rules for Multiple Case Filings apply to these matters. Pursuant to Consumer Rules R-1(d), the AAA administers consumer disputes that meet the due process standards contained in the Consumer Due Process Protocol and Consumer Arbitration Rules. Based on Judge Meyerson's Order, so that the AAA may continue administration of these matters, we request that the business waive the language in Section 6 that violates Principle 8 of the Consumer Due Process Protocol.

Please confirm your agreement to waive the above-noted provision for these multiple case filings by signing and dating below and returning a copy of this letter to the AAA. Absent receipt of the requested waiver, the AAA will decline to administer these matters.


Business (authorized representative)

2/24/23
Date

The waiver should be received no later than March 10, 2023 or the AAA will decline to administer these matters.

Sincerely,

Jill Roettger
Manager of ADR Services
Direct Dial: (612)509-2224
Email: jillroettger@adr.org
Fax: (612)342-2334